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January 12, 2023

Via ECF

Honorable Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Haynes, et al. v. EIA Electric Inc., et al.
Docket No.: 22-cv-8645-RA

Dear Judge Abrams:

This firm represents Defendants George Engel and Matthew Orent. We write this letter to respectfully request an extension to move or otherwise respond to plaintiff's Amended Complaint on or before February 10, 2023. The undersigned was just retained today and needs time to speak with Defendants and review the file to properly answer the complaint. We reached out to Plaintiff's counsel and counsel consents to the application. This is the first request made by Defendants to extend the time to respond to the Amended Complaint.

We thank Your Honor very much for your consideration.

Respectfully submitted,

/s/David R. Ehrlich

David R. Ehrlich

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cc: D. Maimon Kirschenbaum, Esq.
Lucas C. Buzzard, Esq.
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